

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**POWERTRAIN, INC., a Mississippi corporation; TOOL MART, INC., a Mississippi corporation; WOOD SALES COMPANY, INC., a Mississippi Corporation,** }  
Plaintiffs, }  
v. }  
**AMERICAN HONDA MOTOR CO., INC., a California corporation,** }  
Defendant. }  
  
**AMERICAN HONDA MOTOR CO., INC., a California corporation,** }  
Counterclaimant, }  
v. }  
**POWERTRAIN, INC., a Mississippi corporation; TOOL MART, INC., a Mississippi corporation; WOOD SALES COMPANY, INC., a Mississippi Corporation; BEST MACHINERY AND ELECTRICAL, INC.; JOYCE MA, Individually; PUMA CORPORATION or PUMA INDUSTRIES, INC.; CHINA NATIONAL ELECTRONICS IMPORT AND EXPORT ZHEJIANG COMPANY; TONG YONG ENGINE MADING, INC. OR SHAOXING TONGYONG ENGINE MADING COMPANY, INC. d/b/a TEBCO; XING YUE GROUP; and ZHEJIANG EVER FINE ELECTRIC APPLIANCE GROUP, LTD.,** }  
Counterdefendants. }  
}

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**REQUEST FOR VOLUNTARY DISMISSAL OF JOYCE MA'S COUNTERCLAIMS  
FILED AGAINST COUNTERCLAIMANT AMERICAN HONDA MOTOR CO., INC.**

Pursuant to Federal Rule of Civil Procedure 41 (a)(2), individual counterclaimant Joyce Ma requests the Court enter dismissal of her counterclaims filed on her behalf of the counterclaims made against counterclaimant American Honda Motor Co., Inc. (“Honda”) It is respectfully submitted to the Court that entering such a dismissal does not prejudice Honda in any manner as the counterclaimant Best Machinery & Electrical, Inc. (“Best”) remains a counterclaimant, of which entity Joyce Ma continues as the discovery designee for the Best.

Honda has been named a defendant in this matter by Plaintiffs. Honda has responded to the Plaintiffs’ complaint by filing a counterclaim naming among others, Best and Joyce Ma as an individual counterdefendant. In turn, Best and Joyce Ma, individually, filed a counterclaim against Honda, which has recently been amended (Document # 252-1).

It is respectfully submitted to the Court that this voluntary dismissal is well-taken and will not in any manner prejudice Honda. A proposed Order is attached hereto as Exhibit 1.

Dated: 30th day of June, 2006.

s/ Raymond Buendia

RAYMOND BUENDIA

Attorney for Joyce Ma and Best Machinery & Electrical, Inc.

**CERTIFICATE OF SERVICE**

I, Raymond Buendia, the attorney for Counterdefendants, hereby certifies that I have served a true and correct copy of the above and foregoing REQUEST FOR VOLUNTARY DISMISSAL OF JOYCE MA'S COUNTERCLAIMS FILED AGAINST COUNTERCLAIMANT AMERICAN HONDA MOTOR CO., INC., electronic filing in the adversary proceedings on the following entities on the date subscribed below and as to those not on the electronic mailing list, mailing to the respective addresses occurred on the date below:

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**Douglas F. Halijan**  
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Dated this 30th day of June, 2006.

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s/Raymond Buendia  
RAYMOND BUENDIA

# **EXHIBIT 1**

**ORDER**

On application made by counterdefendant Joyce Ma for entry of dismissal of her counterclaim filed against American Honda Motor CO., Inc., the enters dismissal of said claims.

IT IS SO ORDERED.

DATED: \_\_\_\_\_, 2006

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JUDGE OF THE DISTRICT COURT